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ORIGINAL
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Charles E. Brown,)	Civil Action No. 1:CV-00-1224
Plaintiff	(
v.)	
County Of Schuylkill,	(
Schuylkill County Prison)	
Board Members,	(
Schuylkill County Prison)	
Gerald Britton,	(
Forrest L. Shadle,)	
Jerome P. Knowles,	(
Stanley Tobash,)	
Eugene Berdanier,	(
Anthony Kankowski,)	
David J. Kurtz,	(
and William Baldwin,)	
Defendants	(

**FILED
HARRISBURG**

APR - 6 2001

MARY E. D'ANDREA, CLERK
Per
DEPUTY CLERK

MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT

Plaintiff, **Charles E. Brown**, pursuant to Rules 15 (a) Fed. R. Civ. P., requests leave to file an amended complaint.

1. The plaintiff in his original complaint named the County of Schuylkill, et. al. as defendants. Plaintiff also alleges conditions of confinement as a violation of protected Constitutional Amendments.

2. Since filing of the complaint, the plaintiff has determined that an amended complaint for a more concise statement of the allegations surrounding the complaint and to define relief sought relevant to the claim are determining factors in an effective litigation.

3. The Court should grant leave freely to amend a complaint (Foman v. Davis, 371 U.S. 178, 182, 83 S. Ct. 227 (1962); Interroyal Corp. v. Sponseller, 889 F.2d 108, 112 (6th Cir.) cert. den., 494 U.S. 1091 (1990)).

Respectfully submitted,

Dated: _____